

**Commonwealth of Kentucky
Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382**

**Title V
AIR QUALITY PERMIT**

Permittee Name: Ichikoh Manufacturing, Incorporated
Mailing Address: 6601 Midland Industrial Drive
Shelbyville, Kentucky 40065

Source Name: Ichikoh Manufacturing, Incorporated
Mailing Address: 6601 Midland Industrial Drive
Shelbyville, Kentucky 40065

Source Location: 6601 Midland Industrial Drive, Shelbyville

Permit Type: Federally Enforceable
Review Type: Title V, Synthetic Minor

Permit Number: V-98-020 (Revision 1)
Log Number: 54097
**Application
Complete Date:** October 26, 1998

KY EIS ID #: 21-211-00034
SIC Code: 3714

Region: Bluegrass
County: Shelby

Issuance Date: July 30, 1999
Revision Date: November 26, 2001
Expiration Date: July 30, 2004

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SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application, which was determined to be complete on October 26, 1998, the Kentucky Division for Air Quality hereby authorizes the construction and operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in the 401 KAR 50:035, Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

01 (03) P-1 Paint Booth System

- Construction Date: October 1988
- Modified Power Wash equipment in October 1997

Description:

- Alcohol Wipe of extruded parts.
- Base Coat/Clear Coat Booths (Booths #1, #2 and #3) consisting of 5-Sata HVLP Manual Spray Guns.
 - Control Equipment for PM/PM10: Water Curtain; Control Efficiency: 99%
- Clean up Solvent usage.
- No Control Equipment for VOC emissions.

APPLICABLE REGULATIONS:

401 KAR 59:010, New process operations, applies to the particulate matter emissions from emission units constructed on or after July 2, 1975.

1. Operating Limitations:

None

2. Emission Limitations:

1. See the Group Requirements on page 17.
2. Pursuant to 401 KAR 59:010, Section 3.(2), emissions of particulate matter shall not exceed 2.34 lb/hr from Booths #1, #2 or #3.
3. Pursuant to 401 KAR 59:010, Section 3.(1), the opacity of visible emissions shall not equal or exceed 20 percent from Booths #1, #2 or #3.

Compliance Demonstration Method:

- Paint booths #1, #2, or #3 shall be operated only when Water Curtains are operating properly to control particulate emissions. The paint booths are assumed to be in compliance with particulate matter mass emissions limit as long as the Water Curtains are operating properly. See 7. Specific Control Equipment Operating conditions.
- The visible emissions are assumed to be in compliance as long as the Water Curtains are operating properly. See 7. Specific Control Equipment Operating conditions. Also see Section F (6)(a)(2).

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

3. Testing Requirements:

Pursuant to 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 1, performance testing using the Reference Methods specified in 401 KAR 50:015 shall be conducted as required by the division.

4. Specific Monitoring Requirements:

The permittee shall monitor and maintain records of the following parameters:

1. A Mixing log shall be maintained with daily usage rates and formulation of each type of Base Coat, and Clear Coat. The formulation shall include information about amounts of Raw Paint, Catalyst, and Thinner used in each type of Base Coat and Clear Coat. The formulation information shall include the Solids Content of the material. This log shall also contain information about amount of Paint trashed.
2. The monthly usage of Clean up solvent and IPA shall be recorded.

5. Specific Recordkeeping Requirements:

1. See 4. Specific Monitoring Requirements above.
2. A "Monthly Paint Mixing Log" shall be maintained indicating the monthly usage of each paint type used in the paint booth system P1 and the amounts of raw paint, thinner, catalyst and paint trashed by code number. Cleanup solvent and IPA usage shall also be recorded.
3. A "Monthly Paint Usage Report" shall be generated which shows the conversion from the pounds of paint used to gallons used based on the paint weight (lb/gal) information in MSDS. This shall contain:
 - The total gallons of basecoat, clearcoat, catalyst and thinner.
 - The totals for basecoat mix and clearcoat mix.
4. A "Monthly VOC Emissions Report" shall be generated which shows VOC emissions by paint type for each paint. The VOC content (lb/gal) information for raw paint, catalyst and thinner shall be obtained from MSDS sheets.
5. See the Group Requirements on page 17.

6. Specific Reporting Requirements:

See the Group Requirements on page 17.

7. Specific Control Equipment Operating Conditions:

The Water Curtains shall be operated and maintained in accordance with the guidelines set in "Paint Booth Preventive Maintenance" document, which are the Manufacturer's guidelines to meet the control efficiency of 99%. Any deviation in the procedures shall be interpreted

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

as a corresponding loss in control efficiency. Inspections shall be done daily, weekly and monthly as described in "Paint Booth Preventive Maintenance" document. The daily, weekly, and monthly "Booth Maintenance Check Sheets" shall be completed and shall be kept available at the plant site for inspection. Operator logs shall be used to record any deviations in procedures as listed in above document. Logs shall be maintained to document any changes done to the "Paint Booth Preventive Maintenance" document.

SECTION B - EMISSION POINTS, AFFECTED FACILITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

02 (04) P-2 Paint Booth System

- Construction Date: August 1987
- Modification (Robotizing the paint line) in November 1996
- Increase in the throughput at P-2 line (After Issuance of Draft Title V Permit)
- Modification (Robotizing the Manual Spray Booth) Construction date: 8/20/01

Description:

- Alcohol Wipe of extruded parts.
- Base Coat/Clear Coat Booths (Paint Booths #1, #2 and #3) consisting of one (1) Fanuc Model P-120 HVLP robot paint spray system and two (2) Fanuc Model P-100 HVLP robot paint spray systems.
- Control Equipment for PM/PM10: Dry Filter ; Control Efficiency: 98.5%
- Cleanup Solvent usage.
- No Control Equipment for VOC emissions.

APPLICABLE REGULATIONS:

401 KAR 59:010, New process operations, applies to the particulate matter emissions from affected facilities constructed on or after July 2, 1975.

1. **Operating Limitations:** None

2. **Emission Limitations:**

1. See the Group Requirements on page 17.
2. Pursuant to 401 KAR 59:010, Section 3 (2), emissions of particulate matter shall not exceed 2.34 lb/hr from Booths #1, #2 or #3.
3. Pursuant to 401 KAR 59:010, Section 3(1), the opacity of visible emissions shall not equal or exceed 20 percent from Booths #1, #2 or #3.

Compliance Demonstration Method:

- Paint booths #1, #2, or #3 shall be operated only when the Dry Filters are operating properly to control particulate emissions. The paint booths are assumed to be in compliance with particulate matter mass emissions limits long as the Dry Filters are operating properly. See 7. Specific Control Equipment Operating conditions.
- The visible emissions are assumed to be in compliance as long as the Dry Filters are operating properly. See 7. Specific Control Equipment Operating conditions. Also see Section F (6)(a)(2).

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

3. Testing Requirements:

Pursuant to 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in 401 KAR 50:015 shall be conducted as required by the division.

4. Specific Monitoring Requirements:

The permittee shall monitor and maintain records of the following parameters:

1. A Mixing log shall be maintained with daily usage rates and formulation of each type of Base Coat, and Clear Coat. The formulation shall include information about amounts of Raw Paint, Catalyst, and Thinner used in each type of Base Coat and Clear Coat. The formulation information shall include the Solids Content of the material. This log shall also contain information about amount of Paint trashed.
2. The monthly usage of Clean up solvent and IPA shall be recorded.

5. Specific Recordkeeping Requirements:

1. See 4. Specific Monitoring Requirements above.
2. A "Monthly Paint Mixing Log" shall be maintained indicating the monthly usage of each paint type used in the paint booth system P2 and the amounts of raw paint, thinner, catalyst and paint trashed by code number. Cleanup solvent and IPA usage shall also be recorded.
3. A "Monthly Paint Usage Report" shall be generated which shows the conversion from the pounds of paint used to gallons used based on the paint weight (lb/gal) information in MSDS. This shall contain:
 - The total gallons of basecoat, clearcoat, catalyst and thinner.
 - The totals for basecoat mix and clearcoat mix.
4. A "Monthly VOC Emissions Report" shall be generated which shows VOC emissions by paint type for each paint. The VOC content (lb/gal) information for raw paint, catalyst and thinner shall be obtained from MSDS sheets.
5. See the Group Requirements on page 17.

6. Specific Reporting Requirements:

See the Group Requirements on page 17.

7. Specific Control Equipment Operating Conditions:

The Dry Filters shall be operated, maintained, and changed in accordance with the procedures set in the "Process Control document (Filter Change in P-2)", which are the Manufacturer's guidelines to meet the control efficiency of 98.5%. Any deviation in the procedures shall be

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

interpreted as a corresponding loss in control efficiency. The “P-2 Daily Filter Change Record” shall be completed and shall be kept available at plant site for inspection. Operator logs shall be used to record any deviations in Procedures set in the above mentioned document. Logs shall be maintained to document any changes done to the “Process Control document (Filter Change in P-2)” document.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

03 (05) P-3 Paint Booth System

- Construction Date: May '91

Description:

- Alcohol Wipe of extruded parts.
- Base Coat/Clear Coat Booths (Booths #1, #2 and #3) consisting of 3-Sata HVLP Manual Spray Guns.
 - Control Equipment for PM/PM10: Water Curtain; Control Efficiency: 99%
- Clean up Solvent usage.
- No Control Equipment for VOC emissions.

APPLICABLE REGULATIONS:

401 KAR 59:010, New process operations, applies to the particulate matter emissions from emission units constructed on or after July 2, 1975.

1. Operating Limitations:

None

2. Emission Limitations:

1. See the Group Requirements on page 17.
2. Pursuant to 401 KAR 59:010, Section 3.(2), emissions of particulate matter shall not exceed 2.34 lb/hr from Booths #1, #2 or #3.
3. Pursuant to 401 KAR 59:010, Section 3.(1), the opacity of visible emissions shall not equal or exceed 20 percent from Booths #1, #2 or #3.

Compliance Demonstration Method:

- Paint booths #1, #2, or #3 shall be operated only when Water Curtains are operating properly to control particulate emissions. The paint booths are assumed to be in compliance with particulate matter mass emissions limit as long as the Water Curtains are operating properly. See 7. Specific Control Equipment Operating conditions.
- The visible emissions are assumed to be in compliance as long as the Water Curtains are operating properly. See 7. Specific Control Equipment Operating conditions. Also see Section F (6)(a)(2).

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

3. Testing Requirements:

Pursuant to 401 KAR 59:005 Section 2(2) and 401 KAR 50:045, Section 1, performance-testing using the Reference Methods specified in 401 KAR 50:015 shall be conducted as required by the division.

4. Specific Monitoring Requirements:

The permittee shall monitor and maintain records of the following parameters:

1. A Mixing log shall be maintained with daily usage rates and formulation of each type of Base Coat, and Clear Coat. The formulation shall include information about amounts of Raw Paint, Catalyst, and Thinner used in each type of Base Coat and Clear Coat. The formulation information shall include the Solids Content of the material. This log shall also contain information about amount of Paint trashed.
2. The monthly usage of Clean up solvent and IPA shall be recorded.

5. Specific Recordkeeping Requirements:

1. See 4. Specific Monitoring Requirements above.
2. A "Monthly Paint Mixing Log" shall be maintained indicating the monthly usage of each paint type used in the paint booth system P3 and the amounts of raw paint, thinner, catalyst and paint trashed by code number. Cleanup solvent and IPA usage shall also be recorded.
3. A "Monthly Paint Usage Report" shall be generated which shows the conversion from the pounds of paint used to gallons used based on the paint weight (lb/gal) information in MSDS. This shall contain:
 - The total gallons of basecoat, clearcoat, catalyst and thinner.
 - The totals for basecoat mix and clearcoat mix.
4. A "Monthly VOC Emissions Report" shall be generated which shows VOC emissions by paint type for each paint. The VOC content (lb/gal) information for raw paint, catalyst and thinner shall be obtained from MSDS sheets.
5. See the Group Requirements on page 17.

6. Specific Reporting Requirements:

See the Group Requirements on page 17.

7. Specific Control Equipment Operating Conditions:

The Water Curtains shall be operated and maintained in accordance with the guidelines set in "Paint Booth Preventive Maintenance" document, which are the Manufacturer's guidelines to meet the control efficiency of 99%. Any deviation in the procedures shall be interpreted as a corresponding loss in control efficiency. Inspections shall be done daily, weekly and

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

monthly as described in "Paint Booth Preventive Maintenance" document. The daily, weekly, and monthly "Booth Maintenance Check Sheets" shall be completed and shall be kept available at plant site for inspection. Operator logs shall be used to record any deviations in procedures as listed in above document. Logs shall be maintained to document any changes done to the "Paint Booth Preventive Maintenance" document.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

04 (06) P-4 Paint Booth System

- Construction Date: December 1992

Description:

- Alcohol Wipe of extruded parts.
- Base Coat/Clear Coat Booths (Booths #1, #2, #3 and #4) consisting of 4-Sata HVLP Manual Spray Guns.
 - Control Equipment for PM/PM10: Water Curtain; Control Efficiency: 99%
- Clean up Solvent usage.
- No Control Equipment for VOC emissions.

APPLICABLE REGULATIONS:

401 KAR 59:010, New process operations, applies to the particulate matter emissions from emission units constructed on or after July 2, 1975.

1. **Operating Limitations:** None

2. **Emission Limitations:**

1. See the Group Requirements on page 17.
2. Pursuant to 401 KAR 59:010, Section 3. (2), emissions of particulate matter shall not exceed 2.34 lb/hr from Paint Booths #1, #2, #3 or #4.
3. Pursuant to 401 KAR 59:010, Section 3. (1), the opacity of visible emissions shall not equal or exceed 20 percent from Paint Booths #1, #2, #3 or #4.

Compliance Demonstration Method:

- Paint booths #1, #2, #3, or #4 shall be operated only when Water Curtains are operating properly to control particulate emissions. The paint booths are assumed to be in compliance with particulate matter mass emissions limit as long as the Water Curtains are operating properly. See 7. Specific Control Equipment Operating conditions.
- The visible emissions are assumed to be in compliance as long as the Water Curtains are operating properly. See 7. Specific Control Equipment Operating conditions. Also see Section F(6)(a)(2).

3. **Testing Requirements:**

Pursuant to 401 KAR 59:005 Section 2(2) and 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in 401 KAR 50:015 shall be conducted as required by the division.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

4. Specific Monitoring Requirements:

The permittee shall monitor and maintain records of the following parameters:

1. A Mixing log shall be maintained with daily usage rates and formulation of each type of Base Coat, and Clear Coat. The formulation shall include information about amounts of Raw Paint, Catalyst, and Thinner used in each type of Base Coat and Clear Coat. The formulation information shall include the Solids Content of the material. This log shall also contain information about the amount of Paint trashed.
2. The monthly usage of Clean up solvent and IPA shall be recorded.

5. Specific Recordkeeping Requirements:

1. See 4. Specific Monitoring Requirements above.
2. A "Monthly Paint Mixing Log" shall be maintained indicating the monthly usage of each paint type used in the paint booth system P4 and the amounts of raw paint, thinner, catalyst and paint trashed by code number. Cleanup solvent and IPA usage shall also be recorded.
3. A "Monthly Paint Usage Report" shall be generated which shows the conversion from the pounds of paint used to gallons used based on the paint weight (lb/gal) information in MSDS. This shall contain:
 - The total gallons of basecoat, clearcoat, catalyst and thinner.
 - The totals for basecoat mix and clearcoat mix.
4. A "Monthly VOC Emissions Report" shall be generated which shows VOC emissions by paint type for each paint. The VOC content (lb/gal) information for raw paint, catalyst and thinner shall be obtained from MSDS sheets.
5. See the Group Requirements on page 17.

6. Specific Reporting Requirements:

See the Group Requirements on page 17.

7. Specific Control Equipment Operating Conditions:

The Water Curtains shall be operated and maintained in accordance with the guidelines set in "Paint Booth Preventive Maintenance" document, which are the Manufacturer's guidelines to meet the control efficiency of 99%. Any deviation in the procedures shall be interpreted as a corresponding loss in control efficiency. Inspections shall be done daily, weekly and monthly as described in "Paint Booth Preventive Maintenance" document. The daily, weekly, and monthly "Booth Maintenance Check Sheets" shall be completed and shall be kept available at plant site for inspection. Operator logs shall be used to record any deviations in Procedures set in the above-mentioned document. Logs shall be maintained to document any changes done to the "Paint Booth Preventive Maintenance" document.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

05 (07) P-5 Paint Booth System

- Construction Date: December 1992

Description:

- Alcohol Wipe of extruded parts.
- Base Coat/Clear Coat Booths (Booths #1, #2, #3 and #4) consisting of 4-Sata HVLP Manual Spray Guns.
 - Control Equipment for PM/PM10: Water Curtain; Control Efficiency: 99%
- Clean up Solvent usage.
- No Control Equipment for VOC emissions.

APPLICABLE REGULATIONS:

401 KAR 59:010, New process operations, applies to the particulate matter emissions from emission units constructed on or after July 2, 1975.

1. **Operating Limitations:** None

2. **Emission Limitations:**

1. See the Group Requirements on page 17.
2. Pursuant to 401 KAR 59:010, Section 3.(2), emissions of particulate matter shall not exceed 2.34 lb/hr from Paint Booths #1, #2, #3 or #4.
3. Pursuant to 401 KAR 59:010, Section 3.(1), the opacity of visible emissions shall not equal or exceed 20 percent from Paint Booths #1, #2, #3 or #4.

Compliance Demonstration Method:

- Paint booths #1, #2, #3, or #4 shall be operated only when Water Curtains are operating properly to control particulate emissions. The paint booths are assumed to be in compliance with particulate matter mass emissions limit as long as the Water Curtains are operating properly. See 7. Specific Control Equipment Operating conditions.
- The visible emissions are assumed to be in compliance as long as the Water Curtains are operating properly. See 7. Specific Control Equipment Operating conditions. Also see Section F (6)(a)(2).

3. **Testing Requirements:**

Pursuant to 401 KAR 59:005, Section 2(2), and 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in 401 KAR 50:015 shall be conducted as required by the division.

SECTION B - EMISSION POINTS, AFFECTED FACILITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

4. Specific Monitoring Requirements:

The permittee shall monitor and maintain records of the following parameters:

1. A Mixing log shall be maintained with daily usage rates and formulation of each type of Base Coat, and Clear Coat. The formulation shall include information about amounts of Raw Paint, Catalyst, and Thinner used in each type of Base Coat and Clear Coat. The formulation information shall include the Solids Content of the material. This log shall also contain information about the amount of Paint trashed.
2. The monthly usage of Clean up solvent and IPA shall be recorded.

5. Specific Recordkeeping Requirements:

1. See 4. Specific Monitoring Requirements above.
2. A "Monthly Paint Mixing Log" shall be maintained indicating the monthly usage of each paint type used in the paint booth system P5 and the amounts of raw paint, thinner, catalyst, and paint trashed by code number. Cleanup solvent and IPA usage shall also be recorded.
3. A "Monthly Paint Usage Report" shall be generated which shows the conversion from the pounds of paint used to gallons used based on the paint weight (lb/gal) information in MSDS. This shall contain:
 - The total gallons of basecoat, clearcoat, catalyst and thinner.
 - The totals for basecoat mix and clearcoat mix.
4. A "Monthly VOC Emissions Report" shall be generated which shows VOC emissions by paint type for each paint. The VOC content (lb/gal) information for raw paint, catalyst and thinner shall be obtained from MSDS sheets.
5. See the Group Requirements on page 17.

6. Specific Reporting Requirements:

See the Group Requirements on page 17.

7. Specific Control Equipment Operating Conditions:

The Water Curtains shall be operated and maintained in accordance with the guidelines set in "Paint Booth Preventive Maintenance" document, which are the Manufacturer's guidelines to meet the control efficiency of 99%. Any deviation in the procedures shall be interpreted as a corresponding loss in control efficiency. Inspections shall be done daily, weekly and monthly as described in "Paint Booth Preventive Maintenance" document. The daily, weekly, and monthly "Booth Maintenance Check Sheets" shall be completed and shall be kept available at plant site for inspection. Operator logs shall be used to record any deviations in Procedures set in the above-mentioned document. Logs shall be maintained to document any changes done to the "Paint Booth Preventive Maintenance" document.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

GROUP Requirements: This section addresses requirements that apply to any groups of affected facilities. There is only one group requirement for this plant: plant wide emissions of Volatile Organic Compounds (VOC) are limited to 239 TPY to preclude applicability of 401 KAR 51:017, Prevention of Significant Deterioration. This section specifies the plant wide VOC emission limit and applies to all affected facilities that are sources of VOC.

LIST OF POINTS:

- 01 (03) P-1 Paint Booth System
- 02 (04) P-2 Paint Booth System
- 03 (05) P-3 Paint Booth System
- 04 (06) P-4 Paint Booth System
- 05 (07) P-5 Paint Booth System
- (--) Plastic Molding Machines
- 06 (--) Alcohol Wipe Areas for P-2, P-3, P-4 and P-5
- 07 (--) Clean up Solvent usage

Note: The VOC emissions from paint operations shall be calculated as if 100% would be emitted at each paint booth where applied.

APPLICABLE REGULATIONS:

To preclude the applicability of 401 KAR 51:017, Prevention of Significant Deterioration, the source has elected to accept a plant wide emission of VOC's not to exceed 239 tons in any consecutive twelve month period.

1. Operating Limitations:

None

2. Emission Limitations:

To preclude the applicability of 401 KAR 51:017, Prevention of Significant Deterioration, the plant wide emissions of VOC's shall not exceed 239 tons in any twelve (12) consecutive months period.

Compliance Demonstration Method:

Monthly VOC Emissions from the Paint Booth Systems = $\sum E_i \text{ basecoat} + \sum E_i \text{ clearcoat} + \sum E_i \text{ Solvent} + \sum E_i \text{ IPA}$

where $E_i \text{ basecoat}$ = Monthly VOC Emissions in Tons from each paint booth system from the application of the Base Coat (Paint, Catalyst and Thinner)
and I corresponds to the paint booth systems P1, P2, P3, P4 and P5.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Where r = Paint room (Enclosed Spray Station) number

R = Total number of Paint Rooms in each Paint Booth Systems (P1, P2, P3, P4 and P5)

p = Paint number

P = Total number of Paints used

$E_{i \text{ clearcoat}}$ = Monthly VOC Emissions in Tons from each paint booth system from the application of the Clear Coat (Paint, Catalyst and Thinner) and I corresponds to the paint booths P1, P2, P3, P4 and P5.

$$E_{i \text{ clearcoat}} = \sum_{r=1}^R [\text{BASE VOC emissions} + \text{CATALYST VOC emissions} + \text{THINNER VOC emissions}]$$

Where r = Paint room Number

R = Total number of Paint Rooms in each Paint Booth Systems (P1, P2, P3, P4 and P5)

$E_{i \text{ solvent}}$ = Monthly VOC Emissions in Tons from each paint booth system from the usage of solvent and I corresponds to the paint booth systems P1, P2, P3, P4 and P5.

$E_{i \text{ IPA}}$ = Monthly VOC Emissions in Tons from each paint booth system from the usage of IPA and I corresponds to the paint booth systems P1, P2, P3, P4 and P5.

The monthly VOC emissions ($E_{i \text{ clearcoat}}$, $E_{i \text{ basecoat}}$) shall be calculated from the records of daily paint usage, which is kept at each paint booth system (P1, P2, P3, P4 and P5). The daily paint usage records shall be compiled monthly and the monthly VOC emissions shall be calculated. The monthly VOC emissions ($E_{i \text{ solvent}}$, $E_{i \text{ IPA}}$) shall be calculated from the monthly records of the IPA and Solvent usage at each paint booth system.

Monthly VOC emissions from = [Monthly throughput of ABS (or other) plastic X Emission factor
Plastic Molding Machines listed in Kentucky Emissions Inventory]

Plant wide Monthly VOC emissions = Monthly VOC Emissions from the Paint Booth Systems
+ Monthly VOC emissions from Plastic Molding Machines

Yearly VOC Emission Rate = 12 month rolling total of monthly emissions

3. Testing Requirements:

Pursuant to 401 KAR 59:005 Section 2(2) and 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in 401 KAR 50:015 shall be conducted as required by the division.

SECTION B - EMISSION POINTS, AFFECTED FACILITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

4. Specific Monitoring Requirements:

See specific monitoring requirements for each set under individual emissions point listing.

5. Specific Recordkeeping Requirements:

1. See specific Record keeping requirements for each paint booth system under individual emissions point listing.
2. A "Master Paint Inventory List" shall be maintained by type of paint, and number containing information about weight of paint (lb/gal) and VOC content (lb/gal) of paint. This inventory list shall be updated as new paints are added or paint formulas are changed. This inventory shall be linked to the "Paint Usage Report" and "VOC Emissions report" to insure latest information is used in emissions calculations. The MSDS sheets of all the paints shall be kept available at plant.
3. The MSDS sheets for clean up solvent and IPA shall be kept available at the plant. The monthly amounts of IPA and clean up solvent usage records shall be maintained for the areas listed in insignificant activity list.
4. The records of monthly throughput of ABS plastic and other plastics used in molding operation shall be kept available at the plant.
5. The permittee shall compile monthly records of the total VOC emissions (Process and Fugitive) at the plant (VOC Emissions Summary Report). Compliance with the annual emission limit shall be determined as a 12-month rolling total.

6. Specific Reporting Requirements:

The monthly VOC emissions summary reports from the entire plant shall be submitted to the Frankfort regional office on monthly basis. The monthly reports shall be submitted within 30 days after end of each month. The "VOC Emissions Summary Report" shall summarize the total amount of VOC's emitted from each Paint Booth Systems (P1, P2, P3, P4, and P5) of basecoat, clearcoat, solvent and IPA emissions in pounds and tons for the month. The report shall include the VOC emissions from the molding operations. The report shall also include the twelve-month rolling total of VOC emissions ending with the month in consideration.

7. Specific Control Equipment Operating Conditions:

See specific Control Equipment Operating Conditions under each paint booth system under individual emissions point listing.

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 50:035, Section 5(4). While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

<u>Description</u>	<u>Generally Applicable Regulation</u>
1. Twenty-nine natural gas fired space heaters to control the building temperature (1-29)	
2. Transfer operation of 'Trashed Paint' not used in spray applications into 55 gal drums (Unused paint mix). (Stack numbers: 16, 17, 46, 47, 75, 76, 77, 94, 95, 96, 110, 111, 112, and 113)	401 KAR 63:010
3. Plastic Storage Silos (3)	401 KAR 59:010
4. Twenty-Two (22) Plastic Molding Machines	401 KAR 59:010
5. Ten (10) new Plastic Molding Machines (Construction after Draft Permit issuance)	401 KAR 59:010
6. Plastic Regranulators (2)	401 KAR 59:010
7. Miscellaneous Vents (Various Roof Penetrations for temperature Control and personnel comfort)	
8. Power Wash for P1 line and the Dry-Off Oven	
9. Flash-Off Tunnels for P-1, P-2, P-3, P-4, P-5 Paint booth systems	
10. Deionization Area (Air Blow Off and Filters at P-2, P-3, P-4 and P-5)	
11. Pump Rooms (2)	
12. 0.9 mmBTU/hr Natural Gas fired Heater (P-1 curing Oven, Stack 23)	
13. 0.9 mmBTU/hr Natural Gas fired Heater (P-2 Curing Oven, Stack 51)	
14. 0.9 mmBTU/hr Natural Gas fired heater (P-3 Curing Oven, Stack 72)	
15. 0.71 mmBTU/hr Natural Gas fired heater (P-4 AC/Heater, Stack 89) 0.9 mmBTU/hr Natural Gas fired heater (P-4 Curing Oven, Stack 90)	
16. 0.71 mmBTU/hr Natural Gas fired heater (P-5 AC/Heater, Stack 105) 0.9 mmBTU/hr Natural Gas fired heater (P-5 Curing Oven, Stack 108)	

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. Pursuant to 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in 401 KAR 50:015 shall be conducted as required by the division. If different testing methods are proposed from above mentioned regulation or if there is no suitable reference method for the measurement of VOC, a testing protocol shall be submitted by the source one (1) month in advance, and be approved by the division.
2. Compliance with annual emissions and processing limitations imposed pursuant to 401 KAR 50:035, Section 7(1)(a), and contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months. See compliance demonstration methods for individual emission points.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS

1. When continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
 - a. Date, place as defined in this permit, and time of sampling or measurements.
 - b. Analyses performance dates;
 - c. Company or entity that performed analyses;
 - d. Analytical techniques or methods used;
 - e. Analyses results; and
 - f. Operating conditions during time of sampling or measurement;
2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality. [401 KAR 50:035, Permits, Section 7(1)(d)2 and 401 KAR 50:035, Permits, Section 7(2)(c)]
3. In accordance with the requirements of 401 KAR 50:035, Permits, Section 7(2)(c) the permittee shall allow the Cabinet or authorized representatives to perform the following:
 - a. Enter upon the premises where a source is located or emissions-related activity is conducted, or where records are kept;
 - b. Have access to and copy, at reasonable times, any records required by the permit:
 - i. During normal office hours, and
 - ii. During periods of emergency when prompt access to records is essential to proper assessment by the Cabinet;
 - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit. Reasonable times shall include, but are not limited to the following:
 - i. During all hours of operation at the source,
 - ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - iii. During an emergency; and
 - d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements. Reasonable times shall include, but are not limited to the following:
 - i. During all hours of operation at the source,
 - ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - iii. During an emergency.
4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

5. Reports of any monitoring required by this permit shall be reported to the division's Frankfort Regional Office no later than the six-month anniversary date of this permit and every six months thereafter during the life of this permit, unless otherwise stated in this permit. The reports are due within 30 days after the end of each six month reporting period which commences on the initial issuance date of this permit. The permittee may shift to semi-annual reporting on a calendar year basis upon approval of the regional office. If calendar year reporting is approved, the semi-annual reports are due January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to Section 6(1) of 401 KAR 50:035, Permits. All deviations from permit requirements shall be clearly identified in the reports.
6.
 - a. In accordance with the provisions of 401 KAR 50:055, Section 1 the owner or operator shall notify the Division for Air Quality's Frankfort Regional Office concerning startups, shutdowns, or malfunctions as follows:
 1. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 2. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) and shall cause written notice upon request.
 - b. In accordance with the provisions of 401 KAR 50:035, Section 7(1)(e)2, the owner or operator shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by general condition 6 a. above) to the Division for Air Quality's Frankfort Regional Office.
7. Pursuant to 401 KAR 50:035, Permits, Section 7(2)(b), the permittee shall certify compliance with the terms and conditions contained in this permit, annually on the permit issuance anniversary date by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Division for Air Quality's Frankfort Regional Office and the U.S. EPA in accordance with the following requirements:
 - a. Identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status regarding each term or condition of the permit;
 - c. Whether compliance was continuous or intermittent; and
 - d. The method used for determining the compliance status for the source, currently and over the reporting period, pursuant to 401 KAR 50:035, Section 7(1)(c),(d), and (e).
 - e. The certification shall be postmarked by the thirtieth (30) day following the applicable permit issuance anniversary date or by January 30th of each year if calendar year reporting is approved by the regional office.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

Annual compliance certifications should be mailed to the following addresses:

Division for Air Quality	U.S. EPA Region IV	Division for Air Quality
Frankfort Regional Office	Air Enforcement Branch	Central Files
643 Teton Trail, Suite B	Atlanta Federal Center	803 Schenkel Lane
Frankfort, KY 40601	61 Forsyth St.	Frankfort, KY 40510
	Atlanta, GA 30303-8960	

8. In accordance with 401 KAR 50:035, Section 23, the permittee shall provide the division with all information necessary to determine its subject emissions within thirty (30) days of the date the KEIS emission report is mailed to the permittee.
9. Pursuant to Section VII.3 of the policy manual of the Division for Air Quality as referenced by 401 KAR 50:016, Section 1(1), results of performance test(s) required by the permit shall be submitted to the division by the source or its representative within forty-five days after the completion of the fieldwork.

SECTION G - GENERAL CONDITIONS

(a) General Compliance Requirements

1. The permittee shall comply with all conditions of this permit. A noncompliance shall be a violation of state regulation 401 KAR 50:035, Permits, Section 7(3)(d) and is also a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition.
3. This permit may be revised, revoked, reopened and reissued, or terminated for cause. The permit will be reopened for cause and revised accordingly under the following circumstances:
 - a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 50:035, Section 12(2)(c);
 - b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
 - c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish to the division, in writing, information that the division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. [401 KAR 50:035, Permits, Section 7(2)(b) 3e and 401 KAR 50:035, Permits, Section 7(3)(j)]
5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority.
6. Any condition or portion of this permit that becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit. [401 KAR 50:035, Permits, Section 7(3)(k)]

SECTION G - GENERAL CONDITIONS (CONTINUED)

7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance. [401 KAR 50:035, Permits, Section 7(3)(e)]
8. Except as identified as state-origin requirements in this permit, all terms and conditions contained herein shall be enforceable by the United States Environmental Protection Agency and citizens of the United States.
9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6). [401 KAR 50:035, Permits, Section 7(3)(h)]
10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [401 KAR 50:035, Permits, Section 8(3)(b)]
11. This permit shall not convey property rights or exclusive privileges. [401 KAR 50:035, Permits, Section 7 (3)(g)]
12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Natural Resources and Environmental Protection or any other federal, state, or local agency.
13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry. [401 KAR 50:035, Permits, Section 7(2)(b)5]
14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders. [401 KAR 50:035, Permits, Section 8(3)(a)]
15. Permit Shield: Except as provided in 401 KAR 50:035, Permits, compliance by the affected facilities listed herein with the conditions of this permit shall be deemed to be compliance with all applicable requirements identified in this permit as of the date of issuance of this permit.
16. All previously issued construction and operating permits are hereby null and void.

SECTION G - GENERAL CONDITIONS (CONTINUED)

(b) Permit Expiration and Reapplication Requirements

1. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the division. [401 KAR 50:035, Permits, Section 12]

(c) Permit Revisions

1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of 401 KAR 50:035, Section 15.
2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority thirty (30) days in advance of the transfer.

(d) Construction, Start-Up, and Initial Compliance Demonstration Requirements

1. Construction of process and/or air pollution control equipment authorized by this permit shall be conducted and completed only in compliance with the conditions of this permit.
2. Within thirty (30) days following commencement of construction, and within fifteen (15) days following start-up; and attainment of the maximum production rate specified in the permit application, or within fifteen (15) days following the issuance date of this permit, whichever is later, the permittee shall furnish to the Division for Air Quality's Frankfort Regional Office in writing, with a copy to the Division's Frankfort Central Office, notification of the following:
 - a. The date when construction commenced.
 - b. The date of start-up of the affected facilities listed in this permit.
 - c. The date when the maximum production rate specified in the permit application was achieved.
3. Pursuant to 401 KAR 50:035, Permits, Section 13(1), unless construction is commenced on or before 18 months after the date of issue of this permit, or if construction is commenced and then stopped for any consecutive period of 18 months or more, or if construction is not completed within eighteen (18) months of the scheduled completion date, then the construction and operating authority granted by this permit for those affected facilities for which construction was not completed shall immediately become invalid. Extensions of

SECTION G - GENERAL CONDITIONS (CONTINUED)

the time periods specified herein may be granted by the division upon a satisfactory request showing that an extension is justified.

4. Operation of the affected facilities for which construction is authorized by this permit shall not commence until compliance with the applicable standards specified herein has been demonstrated pursuant to 401 KAR 50:055, except as provided in Section I of this permit.
5. This permit shall allow time for the initial start-up, operation, and compliance demonstration of the affected facilities listed herein. However, within sixty (60) days after achieving the maximum production rate at which the affected facilities will be operated but not later than 180 days after initial start-up of such facilities, the permittee shall conduct a performance demonstration on the affected facilities in accordance with 401 KAR 50:055, General compliance requirements.

(e) Acid Rain Program Requirements

1. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

(f) Emergency Provisions

1. An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:
 - a. An emergency occurred and the permittee can identify the cause of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and,
 - d. The permittee notified the division as promptly as possible and submitted written notice of the emergency to the division within two working days after the time when emission limitations were exceeded due to the emergency. The notice shall meet the requirements of 401 KAR 50:035, Permits, Section 7(1)(e)2, and include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken. This requirement does not relieve the source of any other local, state or federal notification requirements.
2. Emergency conditions listed in General Condition (f) 1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement.
3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 50:035, Permits, Section 9(3)]

SECTION G - GENERAL CONDITIONS (CONTINUED)

(g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:
RMP Reporting Center
P.O. Box 3346
Merrifield, VA, 22116-3346
2. If requested, submit additional relevant information by the division or the U.S. EPA.

(h) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined in 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166.
 - e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

SECTION H - ALTERNATE OPERATING SCENARIOS

None

SECTION I - COMPLIANCE SCHEDULE

None